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MEMORANDUM FOR: Chief, Regulations Control Division

FROM:

[REDACTED]
Office of General Counsel

SUBJECT:

Proposed [REDACTED] Ethical Conduct, Conflicts
of Interest, and Financial Disclosure,
Draft D (Job #9570)

1. We have reviewed subject and have certain comments,
as follow.

2. In paragraph a, "Authority," the reference should be
to Titles II and IV of the Ethics in Government Act, not
Title II and IV.

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(2) in any official proceeding where it is determined that another expert in the field cannot practically be obtained; that it is impracticable for the facts or opinions on the same subject to be obtained by other means, and that the former Government employee's testimony is required in the interests of justice. Also, a former employee may not submit pleadings, applications, or other documents in a representational capacity on behalf of another merely because the attorney or other representative must sign the documents under oath or penalty of perjury."

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